

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

KENNETH BERNARD AND KIM  
BERNARD

vs.

PROPERTY & CASUALTY  
INSURANCE COMPANY OF HARTFORD  
PREMIER ADJUSTING SERVICES, INC.,  
JOHN KELLY, TY PATCH, AND EVELYN  
SMITH

§  
§  
§  
§  
§  
§  
§  
§  
§

CASE NO. 1:09CV313-MAC-KFG

**MOTION TO SUBSTITUTE COUNSEL BY DEFENDANT**  
**PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD**

COMES NOW Property & Casualty Insurance Company of Hartford (“Hartford”), and  
file its Motion to Substitute Counsel and in support thereof states:

**I.**

1. Hartford has retained the law firm of Lugenbuhl, Wheaton, Peck, Rankin &  
Hubbard, A Law Corporation, and designates Martin R. Sadler of that firm as the attorney-in-  
charge of the above-captioned matter.

WHEREFORE, PREMISES CONSIDERED, Hartford requests the Court substitute  
Lugenbuhl, Wheaton, Peck, Rankin & Hubbard for Martin, Disiere, Jefferson & Wisdom as  
attorneys of record in the above-captioned cause.

Respectfully submitted,

/s/ Christopher W. Martin

Christopher W. Martin  
State Bar No.: 1305620  
Federal ID No.: 13515  
martin@mdjwlaw.com  
Martin, Disiere, Jefferson &  
Wisdom, L.L.P.  
808 Travis Street, Suite 1800  
Houston, Texas 77002  
Telephone: (713) 632-1700  
Facsimile: (713) 222-0101

**Former Attorney-in-Charge for  
Property & Casualty Insurance Company  
of Hartford  
OF COUNSEL:**

Kristy M. Goldman  
Texas Bar No.: 24066226  
Federal ID No. 987720  
goldman@mdjwlaw.com  
Texas Bar No.: 24043751  
Federal ID No. 38513  
[kemp@mdjwlaw.com](mailto:kemp@mdjwlaw.com)  
MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.  
808 Travis Street, Suite 1800  
Houston, Texas 77002  
Telephone: (713) 632-1700  
Facsimile: (713) 222-0101

Respectfully submitted,

/s/ Martin R. Sadler

Martin R. Sadler  
State Bar No.: 00788842  
Federal ID No.: 18230  
msadler@lawla.com  
Lugenbuhl, Wheaton, Peck, Rankin &  
Hubbard, A Law Corporation  
815 Walker Street, Suite 1447  
Houston, Texas 77002  
Telephone: (713) 222-1990  
Facsimile: (713) 222-1996

**Attorney-in-Charge for  
Property & Casualty Insurance Company  
of Hartford  
OF COUNSEL:**

LUGENBUHL, WHEATON, PECK, RANKIN  
& HUBBARD (-\_\_\_\_)  
815 Walker Street, Suite 1447  
Houston, Texas 77002  
Telephone: (713) 222-1990  
Facsimile: (713) 222-1990

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing has been forwarded via certified mail, return receipt requested, on this 27th day of May 2010 to:

Michael R. Ramsey  
Gregory F. Cox  
J. Steve Mostyn  
THE MOSTYN LAW FIRM  
3810 West Alabama  
Houston, Texas 77027

/s/ Martin R. Sadler  
Martin R. Sadler